



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



APR 29 2013

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1548
Project # S-1104811

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for AERA Energy LLC by incorporating Authorities to Construct S-1548-113-4 and 113-6. The ATCs approved replacing the flare tip, revising monitoring requirements and adding a knockout vessel to Kaldair flare permit S-1548-113.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on April 3, 2013. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

DW:RCR

Enclosures

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



APR 29 2013

Brent Winn
AERA Energy LLC
P O Box 11164
Bakersfield, CA 93389-1164

Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1548
Project # S-1104811

Dear Mr. Winn:

The Air Pollution Control Officer has modified the Title V permit for AERA Energy LLC by incorporating Authorities to Construct S-1548-113-4 and 113-6. The ATCs approved replacing the flare tip, revising monitoring requirements and adding a knockout vessel to Kaldair flare permit S-1548-113.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1548-113-8

EXPIRATION DATE: 05/31/2016

SECTION: 04 **TOWNSHIP:** 27S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

584,318,750 BTU/HR SAFETY FLARE WITH INDAIR I-12 FLARE TIP (LOST HILLS 1 LEASE)

PERMIT UNIT REQUIREMENTS

1. Gas flared shall not exceed 15,000,000 scf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. If the flare is utilized to combust emergency releases of VOC for three (3) hours or more in a calendar quarter, the permittee shall perform a visible emissions inspection using EPA Method 22. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To show compliance with the sulfur limits, the gas being flared shall be tested quarterly for sulfur content and higher heating value. [District Rule 2520, 9.3.2 and 4801] Federally Enforceable Through Title V Permit
4. The sulfur content of the gas being flared shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of emergency and non-emergency operation, hours of operation for flare maintenance and testing, and the amount of gas flared for a period of five years and make such records readily available for District inspection upon request. [District NSR Rule, District Rule 1070, and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. A flame shall be present at all time when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
7. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated when gases may be vented to the flare. Pilot monitoring is not required during unforeseen or essential planned power outages. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
8. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
9. Permittee shall maintain copies of the compliance determination conducted pursuant to Section 6.4.1, copies of the source testing result conducted pursuant to Section 6.4.2, effective on and after July 1, 2011, a copy of the approved flare minimization plan pursuant to Section 6.5, effective on and after July 1, 2012, a copy of annual reports submitted to the APCO pursuant to Section 6.2 and effective on and after July 1, 2011, monitoring data collected pursuant to Sections 5.10, 6.6, 6.7, 6.8, 6.9 and 6.10. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit
10. For flares used during an emergency, the operator shall record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. All records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit
12. VOC emissions, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used, and analysis of halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422 "Determination of Volatile organic Compounds in Emission from Stationary Sources". The VOC concentration in ppmv shall be converted to pounds per million Btu (lb/MMBtu) by using the equation in District Rule 4311, Section 6.3.1. [District Rule 4311, 6.3.1] Federally Enforceable Through Title V Permit
13. NOx emissions in pounds per million BTU shall be determined by using EPA Method 19. NOx and O2 concentrations shall be determined by using EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311, 6.3.2 and 6.3.3] Federally Enforceable Through Title V Permit
14. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, EPA Method 25A or 25B, or an alternative method approved by the APCO, ARB and EPA. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, ASTM Method D 4810-88, or an alternative method approved by the APCO, ARB and EPA. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit
15. If vent gas composition is monitored with a continuous analyzer employing gas chromatography the minimum sampling frequency shall be one sample every 30 minutes. If vent gas composition is monitored using continuous analyzers not employing gas chromatography, the total reduced sulfur content of vent gas shall be determined by using EPA Method D4468-85, or an alternative method approved by the APCO, ARB and EPA. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit
16. Vent gas flow shall be determined using one of the following: EPA Methods 1 and 2; a verification method recommended by the manufacturer of the flow monitoring equipment; tracer gas dilution or velocity; other flow monitors or process monitors that can provide comparison data on a vent stream that is being directed past the ultrasonic flow meter; or an alternative method approved by the APCO, ARB, and EPA. [District Rule 4311, 6.3.5] Federally Enforceable Through Title V Permit
17. The operator shall monitor vent gas composition using one of the five methods pursuant to Section 6.6.1 through Section 6.6.5 in District Rule 4311. [District Rule 4311, 6.6] Federally Enforceable Through Title V Permit
18. The operator shall monitor the volumetric flows of purge and pilot gases with flow measuring devices or other parameters as specified on the Permit to Operate so that volumetric flows of pilot and purge gas may be calculated based on pilot design and the parameters monitored. [District Rule 4311, 6.7] Federally Enforceable Through Title V Permit
19. The operator of a flare with a water seal shall monitor and record the water level and pressure of the water seal that services each flare daily or as specified on the Permit to Operate. [District Rule 4311, 6.8] Federally Enforceable Through Title V Permit
20. Periods of flare monitoring system inoperation greater than 24 continuous hours shall be reported by the following working day, followed by notification of resumption of monitoring. Periods of inoperation of monitoring equipment shall not exceed 14 days per any 18-consecutive-month period. Periods of flare monitoring system inoperation do not include the periods when the system feeding the flare is not operating. [District Rule 4311, 6.9.1] Federally Enforceable Through Title V Permit
21. During periods of inoperation of continuous analyzers or auto-samplers installed pursuant to Section 6.6, operators responsible for monitoring shall take one sample within 30 minutes of the commencement of flaring, from the flare header or from an alternate location at which samples are representative of vent gas composition and have samples analyzed pursuant to Section 6.3.4. During periods of inoperation of flow monitors required by Section 5.10, flow shall be calculated using good engineering practices. [District Rule 4311, 6.9.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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22. Permittee shall maintain and calibrate all required monitors and recording devices in accordance with the applicable manufacturer's specifications. In order to claim that a manufacturer's specification is not applicable, the person responsible for emissions must have, and follow, a written maintenance policy that was developed for the device in question. The written policy must explain and justify the difference between the written procedure and the manufacturer's procedure. [District Rule 4311, 6.9.3] Federally Enforceable Through Title V Permit
23. All in-line continuous analyzer and flow monitoring data must be continuously recorded by an electronic data acquisition system capable of one-minute averages. Flow monitoring data shall be recorded as one-minute averages. [District Rule 4311, 6.9.4] Federally Enforceable Through Title V Permit
24. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
25. Components associated with flare and knockout vessel shall be inspected and any detected leaks repaired in accordance with inspection frequencies and repair times established in District Rule 4409. [District Rule 2201] Federally Enforceable Through Title V Permit
26. VOC content of gas served by inlet liquid knockout vessel and flare shall not exceed 40% VOC/TOC by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Fugitive VOC emissions from components serving the inlet liquid knockout vessel shall not exceed 7.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
28. VOC content of gas shall be determined by ASTM D-1945, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Permittee shall maintain accurate records of fugitive inspection component counts and resultant emissions calculated in accordance with U.S.E.P.A. Protocol for Equipment Leak Emission Estimates (EPA-453/R95-017) Table 2-4 "Oil and Gas Production Operations Average Emission Factors" (November 1995). Permittee shall make records of component counts, and associated emissions, readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Formerly S-1512-1

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